201-16293

Richard Denison
<rdenison@environmentaldefense.org>
06/20/2006 12: 12 PM

To NCIC OPPT@EPA, ChemRTK HPV@EPA, Rtk Chem@EPA, NCIC HPV@EPA, Karen Boswell/DC/USEPA/US@EPA, Sarah-McLallen@americanchemistry.com
cc Skip Matthews <mtc@mchsi.com>, Karen Fiorini <KFlorini@environmentaldefense.org>, Richard Denison <rdenison@environmentaldefense.org>
bcc
Subject Environmental Defense comments on Diisopropyl Ether (CAS# 108-20-3)

(Submitted via Internet 6/20/06 to oppt.ncic@epa.gov, hpv.chemrtk@epa.gov, boswell.karen@epa.gov, chem.rtk@epa.gov, MTC@mchsi.com, and Sarah McLallen @americanchemistry.com)

Environmental Defense appreciates this opportunity to submit comments on the robust summary/test plan for **Diisopropyl Ether (CAS# 108-20-3).**

The American Chemistry Council, in response to EPA's High Production Volume (HPV) Chemical Challenge, has submitted a test plan and robust summaries for diisopropyl ether prepared by ExxonMobil Chemical Company.

Our review of this submission indicates that the test plan is well-written and supported by many peer-reviewed references. The test plan also contains an appendix that consists of summaries of studies addressing most of the required SIDS elements. These summaries were drawn from the IUCLID database files for diisopropyl ether submitted as part of the European Risk Assessment Program on Existing Substances. These summaries are well-organized and concisely presented and provide an excellent example of how the IUCLID databases can be reformatted for appropriate submission under the HPV Challenge. The robust summaries of this submission consist of an original copy of this IUCLID database and are thus largely repetitive of the test plan appendix.

According to this submission all of the SIDS elements required by the HPV challenge are addressed by available studies. However, studies of diisopropyl ether toxicity to invertebrates and algae are considered by the sponsor to be inadequate and are proposed to be repeated. We agree with this proposed work.

With respect to reproductive toxicity, no studies are mentioned in the summary table of the test plan. The only reference to studies of reproductive toxicity appears to be a very brief mention of the lack of reproductive toxicity observed in one study described on page 16 of the test plan. It is not clear whether this SIDS element is adequately addressed by the study referenced (Dalbey and Feuston 1996), as the description of this work in the appendix and summaries provides little discussion of reproductive endpoints. Additional information is needed if this study is to be proposed as fulfilling the reproductive toxicity endpoint.

In summary, this is a thorough and carefully prepared submission. If additional information supports a conclusion that the study described for reproductive toxicity adequately addresses this SIDS element, this submission will fully meet the requirements of the HPV Challenge.

Thank you for this opportunity to comment.

Hazel B. Matthews, Ph.D.
Consulting Toxicologist, Environmental Defense

Richard Denison, Ph.D.
Senior Scientist, Environmental Defense